MEMORANDUM

TO: Air Quality Board

THROUGH: Bryce C. Bird, Executive Secretary

FROM: Jay Baker, Environmental Scientist

DATE: March 6, 2019

SUBJECT: PROPOSE FOR PUBLIC COMMENT: Amend SIP Section XX.A. Regional Haze. Executive Summary; and Section XX.D(6). Regional Haze. Long-Term Strategy for Stationary Sources. Best Available Retrofit Technology (BART) Assessment for NO_x and PM.

In June 2015, the Air Quality Board approved Regional Haze SIP sections addressing Best Available Retrofit Technology (BART) for PM and a BART alternative for NO_x. EPA approved the BART for PM on July 5, 2016 but disapproved the BART alternative for NO_x. The purpose of this SIP revision is to provide additional analysis to support the BART alternative for NO_x and to demonstrate that the alternative will provide greater visibility improvement than would be achieved through the installation of the most stringent NO_x controls on the four electrical generating units (EGU) that are subject to BART.

In the previous submittal, Utah used a weight-of-evidence analysis to show that the alternative was better than BART. One of their reasons for disapproving the BART alternative was that the weight-of-evidence analysis did not show that the alternative was "clearly" better than BART. EPA also acknowledged that the weight-of-evidence analysis is a subjective test. In this submittal, Utah is using dispersion modeling and the two prong test prescribed by the Regional Haze rule in 40 CFR 51.308(e)(3). The two prongs are: (1) Visibility does not decline in any Class I area, and (2) There is an overall improvement in visibility, determined by comparing the average differences between BART and the alternative over all affected Class I areas. The two-prong test is a simple, objective pass-fail test.

1. The SIP keeps in place the current NO_x emission limits for PacifiCorp Hunter 1 and 2 and PacifiCorp Huntington 1 and 2 that are more stringent than EPA's presumptive BART limits; makes enforceable the closure of PacifiCorp Carbon 1 and 2; and takes credit for the installation of low- NO_x burners at PacifiCorp Hunter 3 in 2008.
2. A demonstration that the alternative to BART will achieve greater reasonable progress than BART is attached and will be included in the technical support documentation for the SIP. The new visibility modeling shows that visibility will not decline in any Class I area under the alternative and that the alternative will improve overall visibility compared to the most stringent NO_x controls.

Recommendation: Staff recommends that the Board propose revisions to SIP Sections XX, Part A and Part D.6 for public comment.